



MICHAEL A. CARDOZO
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

CAROLYN WALKER-DIALLO
Labor and Employment Division
Phone: (212) 788-0868
FAX: (212) 788-8877
cwalker@law.nyc.gov

June 19, 2008

By Facsimile

Honorable Barbara S. Jones
United States District Court
Southern District New York
500 Pearl Street, Room 620
New York, NY 10007

Re: Sampson v. City of New York, et al.
07 Civ. 2836 (BSJ) (RLE)
Our Matter No.: 2007-038277

Dear Judge Jones:

I am the Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel for the City of New York, assigned to defend the above-referenced matter. I write to respectfully request leave to file and serve a Summary Judgment motion in this case. Discovery in this matter closed on May 30, 2008. On June 3, 2008, Magistrate Judge Ellis ordered the parties to submit a joint pre-trial order by July 2, 2008. However, based upon discovery exchanged in this case, City defendants believe that they have a strong motion for summary judgment. As such, defendants respectfully propose the following briefing schedule for the motion:

- Defendants' moving papers to be served by July 30, 2008;
- Plaintiff's Opposition papers to be served by August 30, 2008; and
- Defendants' Reply papers, if any, to be served by September 15, 2008.

Respectfully Submitted,

Carolyn Walker-Diallo
Assistant Corporation Counsel

cc: Mary E. Sampson

Application Granted.

SO ORDERED
Dated:

BARBARA S. JONES
U.S.D.J.

6/23/08